

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

TEAM SYSTEMS INTERNATIONAL, LLC,

Debtor.

Chapter 7

Case No. 22-10066 (CTG)

Re: Docket Nos. 206 and 261

**CERTIFICATE OF COUNSEL REGARDING
MOTION OF CHAPTER 7 TRUSTEE FOR AN ORDER, PURSUANT TO
SECTION 105(a) OF THE BANKRUPTCY CODE, BANKRUPTCY RULE 2004, AND
LOCAL BANKRUPTCY RULE 2004-1, AUTHORIZING AND DIRECTING
THE EXAMINATION OF VARIOUS ENTITIES**

The undersigned hereby certifies as follows:

1. On November 10, 2022, George L. Miller, the chapter 7 trustee (the “Chapter 7 Trustee”), filed the *Motion of Chapter 7 Trustee for An Order, Pursuant To Section 105(a) of the Bankruptcy Code, Bankruptcy Rule 2004, and Local Bankruptcy Rule 2004-1, Authorizing and Directing the Examination of Various Entities* (the “Motion”)¹ [D.I. 206] with this Court.

2. The deadline to file an objection or other response to the relief requested in the Motion was November 18, 2022 at 4:00 p.m. Lindsay Blee Americas LLC (“Lindsay Blee”) filed an objection to the Motion [D.I. 261]. No other objections were filed or received.

3. The undersigned counsel circulated a revised form of proposed order (the “Revised Proposed Order”) to Lindsay Blee in attempt to address the objections it raised and to fix a typo. Lindsay Blee has indicated that the Revised Proposed Order resolves its objection.

¹ Capitalized terms used but not defined herein have the meanings assigned to such terms in the Application.

4. Attached hereto as **Exhibit 1** is the Revised Proposed Order. Attached hereto as **Exhibit 2** is a redline showing the changes made to the version of the proposed order filed with the Motion.

5. Accordingly, the Chapter 7 Trustee respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

Dated: December 9, 2022

By: /s/ David W. Carickhoff
David W. Carickhoff (#3715)
ARCHER & GREINER, P.C.
300 Delaware Ave., Suite 1100
Wilmington, DE 19801
Telephone: (302) 777-4350
Facsimile: (302) 777-4352
Email: dcarickhoff@archerlaw.com

Attorneys for the Chapter 7 Trustee

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